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9 **UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12
13 ASHLEY GENNOCK and RANDY
14 NUNEZ, individually and on behalf of all
others similarly situated,

15 Plaintiffs,

16 v.

17 FACEBOOK, INC. and CAMBRIDGE
18 ANALYTICA, LLC,

19 Defendants.
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Case No. 3:18-cv-01891-VC

**NOTICE OF JOINDER BY
DEFENDANT CAMBRIDGE
ANALYTICA, LLC IN DEFENDANT
FACEBOOK, INC.'S MOTION TO
STAY PROCEEDINGS PENDING
RULING BY JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

Hearing Date: May 24, 2018

Hearing Time: 10:00 a.m.

Department: Courtroom 4, 17th Floor

Judge: Hon. Vince Chhabria

PLEASE TAKE NOTICE THAT Defendant Cambridge Analytica LLC (“Cambridge Analytica”) hereby respectfully joins in the Motion to Stay filed by Defendant Facebook, Inc. (“Facebook”) on April 18, 2018 (ECF. No. 37).

Recently, there have been more than twenty closely-related cases filed against Facebook, Inc. and/or Cambridge Analytica (or related entities). All of the cases raise similar claims based on similar legal and factual issues. Cambridge Analytica, along with the plaintiffs in several of the cases and Facebook, has requested that the Judicial Panel on Multidistrict Litigation (“JPML”) transfer and consolidate the cases before a single district court. (*See In re Facebook User Profile Litigation*, MDL No. 2843, ECF. Nos. 1, 7, 16, 19, 57, 64, 65, 71, 73, 75, 78, 79, 80.) The JPML has scheduled a hearing on May 31, 2018, and is likely to decide the motion to transfer and consolidate shortly thereafter.

For the reasons stated in the Motion to Stay, including that a stay pending the JPML's decision on the motion to transfer and consolidate would promote the compelling public interest in judicial economy, a temporary stay in this action is appropriate. The argument and analysis in the Motion applies to Cambridge Analytica,¹ particularly with respect to the risk of prejudice caused by duplicative litigation and inconsistent rulings. Therefore, Cambridge Analytica joins Facebook's Motion and respectfully requests that this action be stayed temporarily until the JPML renders its decision on the pending motion to transfer and consolidate.

CONCLUSION

Cambridge Analytica respectfully requests that the Court stay this action temporarily until the JPML renders a decision on the pending motion to transfer.

¹ To the extent any information in the “Background” section of Facebook’s Motion suggests that Cambridge Analytica engaged in any wrongdoing, Cambridge Analytica does not join in such suggestion, disputes such suggestion, and reserves all rights in this regard.

1 DATED: April 24, 2018

By: /s/ Mark C. Scarsi

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served via the Court's CM/ECF system on all counsel of record on April 24, 2018.

/s/ Ashlee N. Lin
Ashlee N. Lin